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dba Luxor Hotel & Casino, New Castle Corp.
dba Excalibur Hotel & Casino, Circus Circus Casino Inc.
dba Circus Circus Hotel & Casino*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TRUSTEES OF THE NEVADA RESORT
ASSOCIATION—INTERNATIONAL
ALLIANCE OF THEATRICAL STAGE
EMPLOYEES AND MOVING PICTURE
MACHINE OPERATORS OF THE UNITED
STATES AND CANADA, LOCAL 720,
PENSION TRUST; TRUSTEES OF THE
NEVADA RESORT 'ASSOCIATION
INTERNATIONAL ALLIANCE OF
THEATRICAL STAGE EMPLOYEES AND
MOVING PICTURE MACHINE OPERATORS
OF THE UNITED STATES AND CANADA,
LOCAL 720, WAGE DISABILITY TRUST;
and TRUSTEES OF THE NEVADA RESORT
ASSOCIATION—INTERNATIONAL
ALLIANCE OF THEATRICAL STAGE
EMPLOYEES AND MOVING PICTURE
MACHINE OPERATORS OF THE UNITED
STATES AND CANADA, LOCAL 720,
APPRENTICE AND JOURNEYMAN
TRAINING AND EDUCATION TRUST,

Plaintiffs,

vs.

RAMPARTS, LLC dba Luxor Hotel & Casino, a
Nevada limited liability company; NEW
CASTLE CORP. dba Excalibur Hotel & Casino,
a Nevada corporation; and CIRCUS CIRCUS
CASINOS INC. d/b/a CIRCUS CIRCUS
HOTEL & CASINO, a Nevada corporation,

Defendants.

Case No.: 2 :19-cv-01536-RFB-BNW

**STIPULATION AND ORDER
EXTEND DISPOSITIVE MOTIONS
DEADLINES**

(Third Request)

1 Plaintiffs, TRUSTEES OF THE NEVADA RESORT ASSOCIATION—
 2 INTERNATIONAL ALLIANCE OF THEATRICAL STAGE EMPLOYEES AND MOVING
 3 PICTURE MACHINE OPERATORS OF THE UNITED STATES AND CANADA, LOCAL
 4 720, PENSION TRUST; TRUSTEES OF THE NEVADA RESORT ASSOCIATION—
 5 INTERNATIONAL ALLIANCE OF THEATRICAL STAGE EMPLOYEES AND MOVING
 6 PICTURE MACHINE OPERATORS OF THE UNITED STATES AND CANADA, LOCAL
 7 720, WAGE DISABILITY TRUST; and TRUSTEES OF THE NEVADA RESORT
 8 ASSOCIATION—INTERNATIONAL ALLIANCE OF THEATRICAL STAGE EMPLOYEES
 9 AND MOVING PICTURE MACHINE OPERATORS OF THE UNITED STATES AND
 10 CANADA, LOCAL 720, APPRENTICE AND JOURNEYMAN TRAINING AND
 11 EDUCATION TRUST (“Plaintiffs”), through their counsel The Urban Law Firm, and Defendants
 12 Ramparts, LLC dba Luxor Hotel & Casino, New Castle Corp. dba Excalibur Hotel & Casino,¹
 13 Circus Circus Casinos Inc. dba Circus Circus Hotel & Resort,² (“Defendants”) through their
 14 counsel Jackson Lewis P.C., hereby stipulate and request to extend the dispositive motions
 15 deadline up to and including February 7, 2022. In support of this Stipulation and Request, the
 16 parties state the following:

17 1. The current deadline for filing dispositive motions in this case is **December 7,**
 18 **2021.** Counsel for the parties propose that the new date for this deadline should be **February 7,**
 19 **2022.**

20 2. Generally, the deadline for the joint pretrial order is 30 days after the dispositive
 21 motion deadline. *See* LR 26-1(b)(5). Thus, the current Joint Pretrial Order deadline in this case is
 22 **January 6, 2022.** Counsel proposes that the new date for this deadline should be **March 9, 2022.**
 23 In the event the dispositive motions are pending before the Court on that date, the date for filing
 24 the Joint Pretrial Order shall be suspended until thirty (30) days after the date of the Court’s
 25 decision on the last dispositive motion.

27 ¹ Defendant New Castle, LLC, is incorrectly named “New Castle Corp.” in the Complaint.

28 ² The Complaint incorrectly identifies Circus Circus Casinos, Inc. dba Circus Circus Hotel & Resort as
 “dba Circus Circus Hotel & Casino.”

1 3. The parties are continuing to discuss potential resolution of Plaintiff's claims,
2 which would render any dispositive motions unnecessary.

3 4. This request is made in good faith and not for the purpose of delay.

4 5. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed
5 as waiving any claim and/or defense held by any party.

6 Dated this 15th day of November, 2021.

7 **THE URBAN LAW FIRM**

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Counsel for Defendants

16 **ORDER**

17 IT IS SO ORDERED:

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20 
21 United States District Court/Magistrate Judge

22 Dated: November 16, 2021